



# United States Department of the Interior

FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

Columbus Field Office  
3990 East Broad Street  
Columbus, Ohio 43215

September 15, 1983

Mr. Karl Klepitsch, Jr., Chief  
Waste Management Branch  
U. S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: Barbara Russell

Dear Mr. Klepitsch:

This responds to your July 21, 1983 letter on the proposed RCRA permit for Synthetic Products (Dart Industries), 1635 Wayside Road, Cleveland, Ohio.

In general, the U. S. Fish and Wildlife Service's concerns with hazardous waste sites are (1) location; (2) endangered species; and (3) contamination of fish and wildlife.

## Location

We believe that the proper location for a hazardous waste facility is outside the 100-year floodplain. Additionally, a wetland area is inappropriate for location of a hazardous waste facility. The draft permit has no map showing the location of the facility. Therefore, we cannot provide assistance in determining whether the facility is located in a wetland or a floodplain.

The discharge of the stormwater is another concern. Stormwater should not be directed into any stream or other body of water without treatment or some assurance that the runoff does not contain hazardous wastes or promote uptake of contaminants.

## Endangered Species

A review of information in our files indicates there are no endangered, threatened, or proposed species present in the project area. This precludes the need for further action on this project as required by the 1973 Endangered Species Act, as amended. Should the project be modified or new information become available that indicates listed or proposed species may be affected, consultation should be initiated.

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WASTE MANAGEMENT  
BRANCH

Facility: Synthetic Products Company (Dart Industries), Cleveland, Ohio

OHD 077-783-603

Contamination of Fish and Wildlife

Based on an August 18, 1983 telephone conversation with company personnel, it appears that there is little opportunity for contamination of fish and wildlife from the facility due to the enclosed nature of the facility and the fact that runoff water is placed in drums.

Thank you for the opportunity to review the proposed RCRA permit. If you have questions concerning these comments, please contact Mr. T. J. Miller (ETS 374-6650).

Sincerely yours,

  
Kent E. Kroonemeyer  
Supervisor

cc: Ohio EPA, Attn: L. Roggencamp, Columbus, OH